

Timonen describes a mobile terminal visits a network VN different from its home network but does not provide a valid identification needed to access service from the visited network, e.g., the mobile lacks a SIM card or lacks a valid roaming agreement with the visited network. The visiting mobile terminal may access the visited network using a third party user identification scheme (col. 3, lines 21-24 and col. 4, lines 1-13).

In contrast, the independent claims relate to a situation where a mobile terminal visits a single network owned and shared by two or more operators. The Examiner apparently equates a mobile "visiting" a network other than its "home" network with a shared network. But the two are not the same. Nor would a person of ordinary skill in cellular communications confuse these two very different concepts. A shared network ownership is different than roaming arrangements between different networks owned by single operators.

A visited network is visited from the mobile's perspective. A mobile has a home network to which it subscribes. In Timonen, that home network is owned by a single operator. When the mobile roams into another service area outside the service area of its home network, the mobile may obtain service as a roaming mobile from a visiting network assuming the mobile's subscription permits the mobile to be serviced in that visiting network. In Timonen, that visited network VN is owned by a single operator.

The Examiner seems to be arguing that the visited network is sharing its network with the visiting mobile terminal or with the home network operator. But a roaming agreement between two networks (the Examiner's argued sharing arrangement) is not all that is claimed. The independent claims specifically recite "determining which one of the *owners of a shared radio network* that a visiting MT (Mobile Terminal), which MT is not subscribed to any of the owners of said shared radio network, is going to be connected to." Timonen fails to teach a shared radio

network having multiple owners. As a result, Timonen also does not disclose deciding which owner the mobile will be connected to as required by the pending claims.

If the Examiner maintains this or any other further rejection, the Examiner is requested to point out in the applied reference the shared network being identified, and most importantly, the multiple owners of that shared network. While the Examiner cites many references to Timonen, there is no explanation by the Examiner of what entities in Timonen correspond to multiple owners of a shared network.

The Examiner never acknowledges this distinction between a visited network owned by one operator and a shared network serving a visiting mobile terminal that is owned by multiple operators. To highlight this difference, consider the example of a shared 3G network in the instant specification. 3G radio networks are expensive. One way to decrease the costs is for two or more 3G operators to jointly buy a shared 3G radio network like a UTRAN. But nothing in Timonen discloses the VN is shared by two or more network operators. Only different networks with separate owners are described.

Timonen also fails to disclose determining *which one of said owners* said visiting MT is going to be connected based on the derived information" as recited in claims. In the independent claims, it is not simply a matter of determining whether a mobile terminal is permitted to roam to a particular visiting network. Rather, the independent claims acknowledge that an *additional decision* is needed when a network is shared by two or more *owners*. Namely, it must be determined which one of the owners of the shared network that a visiting mobile terminal, which is not a subscriber with any of the owners of the shared radio network, is going to be connected to. Where does Timonen describe determining which one of multiple owners of a shared network that this visiting mobile will connect to?

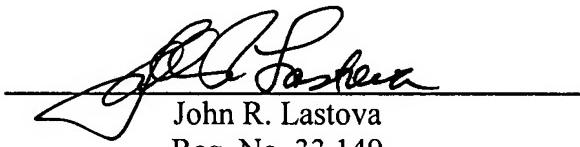
STILLE et al.
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Lacking multiple features required by the independent claims, Applicants respectfully submit that the application is in condition for allowance. An early notice to that effect is earnestly solicited.

Respectfully submitted,

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